

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) Case No.: 4:15-cr-403-2 HEA (SPM)
)
 CHARLES FLOWERS,)
)
 Defendant.)

**FIRST MOTION TO EXTEND THE TIME IN WHICH TO FILE PRETRIAL
MOTIONS**

COMES NOW Defendant, Charles Flowers, by and through counsel, and hereby moves this Court to extend the time in which to file pretrial motions by a period of thirty (30) days. In support of this motion, Defendant states as follows:

1. Defendant was arraigned on September 8, 2015 on an alleged violation of title 21 U.S.C. § 841(a)(1).
2. Counsel for Defendant received three discs of discovery in the mail yesterday.
3. Counsel will have those discs copied and sent to Defendant tomorrow.
4. Because counsel has yet to complete a thorough review of the new discovery, he does not yet know all of the pretrial motions available to Defendant or their relative merit.
5. For this reason, Defendant files the instant motion.
6. For this same reason, the instant motion is necessary to provide counsel for the “defendant...the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.” 18 U.S.C. § 3161(h)(7)(B)(iv). Accordingly, “the ends of justice

served by [granting this motion] outweigh the best interest of the public and the defendant in a speedy trial.” 18 U.S.C. § 3161(h)(7)(A).

WHEREFORE, Defendant respectfully requests this Honorable Court extend the time in which to file pretrial motions by a period of thirty (30) days.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Marc M. Johnson
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CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2015, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court’s electronic filing system upon Ms. Sirena Wissler assistant United States attorney.